

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PATRICIA MENDEZ,)	
)	
Plaintiff,)	
)	Case No. 08-cv-1216
v.)	
)	
SIEBERT GROUP 1, LLC-S.G. SERIES)	Honorable Milton I. Shadur
4, PHILLIP SIEBERT, as owner of Siebert)	
Group 1, LLC-S.G. Series 4 and in his)	
individual capacity, THOMAS ISCHKUM,)	
KAREN ISCHKUM, GSF MORTGAGE)	
CORPORATION, MORTGAGE)	
ELECTRONIC REGISTRATION)	
SYSTEMS, INC., COUNTRYWIDE)	
HOME LOANS, INC., and UNKNOWN)	
OCCUPANTS AND NONRECORD)	
CLAIMANTS,)	
)	
Defendants.)	

PARTIES' RULE 26(f) REPORT

1. Elizabeth Newkirk Jahoda, representing Plaintiff, Patricia Mendez, Raymond Ostler, representing Defendants Seibert Group 1, LLC-S.G. Series 4, Phillip Seibert, Thomas Ischkum, Karen Ischkum, and GSF Mortgage Corporation, and Jena Valdetero, representing Defendants, Countrywide Home Loans, Inc. and Mortgage Electronic Registration Systems, Inc., met on March 19, 2008, pursuant to Fed. R. Civ. P. 26(f).

2. The parties propose the following discovery plan:
- a) Discovery will be needed on all allegations with respect to liability and damages.
 - b) Disclosures pursuant to Fed. R. Civ. P. 26(a)(1) to be made by May 5, 2008. All discovery to be commenced in time to be completed by October 6, 2008 – fact discovery, and January 16, 2009 – expert discovery.

- c) The parties expect that they will each need approximately seven depositions.
 - d) Reports from retained experts under Rule 26(a)(2) are due on November 10, 2008, for the Plaintiff and December 10, 2008, for Defendants.
 - e) Parties should be allowed until June 13, 2008, to join additional parties and to amend the pleadings.
 - f) All potentially dispositive motions should be filed by April 1, 2009.
 - g) Plaintiff to prepare proposed draft pretrial order by June 8, 2009. Parties to file joint final pretrial order by July 1, 2009.
 - h) The case should be ready for trial by July, 2009. At this time, trial is expected to take approximately three days.
3. At least 14 days prior to the Rule 16(b) scheduling conference, Plaintiff is directed to make a written settlement demand to Defendants. At least 7 days prior to the scheduling conference, Defendants are to respond in writing to Plaintiff's settlement demand.
4. Parties do not consent to proceed before a Magistrate Judge.

Dated: April 1, 2008

Respectfully submitted,

<p><u>/s/ Jena Valdetero</u> One of the Attorneys for Defendants Countrywide Home Loans, Inc. and Mortgage Electronic Registration Systems, Inc.</p> <p>Steven R. Smith Jena Valdetero BRYAN CAVE LLP 161 North Clark Street Suite 4300 Chicago, IL 60601-3315 Telephone: (312) 602-5000 Facsimile: (312) 602-5050</p>	<p><u>/s/ Elizabeth Newkirk Jahoda</u> One of the Attorneys for Plaintiff</p> <p>Elizabeth Newkirk Jahoda Ana Collazo Eliot Abarbanel PRAIRIE STATE LEGAL SERVICES, INC. 350 S. Schmale Rd., Suite 150 Carol Stream, IL 60188</p>
<p><u>/s/ Raymond Ostler</u> One of the Attorneys for Defendants Seibert Group 1, LLC-S.G. Series 4, Phillip Seibert, Thomas Ischkum, Karen Ischkum, and GSF Mortgage Corporation</p> <p>Raymond Ostler GOMBERG, SHARFMAN, GOLD, and OSTLER, P.C. 208 South La Salle Street, Suite 1200 Chicago, Illinois 60604 Telephone 312/332-6194 Fax 312/332-4083</p>	